

## REMARKS/ARGUMENTS

Claims 1-27 are pending in the present application. In the Response to Office Action that was filed on May 29, 2007, Applicants amended claims 1-5, 7, 10-13, 16, 19-23, and 25; and cancelled claims 6, 8-9, 15, 17-18, 24, and 26-27 from further consideration in this application. Applicants are not conceding in this application that those claims are not patentable over the art cited by the Examiner, as the present claim amendments and cancellations are only for facilitating expeditious prosecution of the application. Applicants respectfully reserve the right to pursue these and other claims in one or more continuations and/or divisional patent applications. Reconsideration of the claims is respectfully requested.

This Supplemental Amendment presents the same arguments as those that were made in the Response to Office Action that was filed on May 29, 2007.

### **I. 35 U.S.C. § 102, Anticipation**

The Examiner has rejected claims 1-6, 8-15, 17-24, and 26-27 under 35 U.S.C. § 102(e) as being anticipated by *Kakivaya et al.*, Ad-Hoc Service Discovery Protocol, U.S. Patent Application Publication No. 2004/0267876, published December 30, 2004 (hereinafter referred to as "*Kakivaya*"). This rejection, as it might be applied to the claims as amended, is respectfully traversed.

Applicants' independent claims recite similar features. Applicants' claim 1 recites:

each one of said automation tools being an application that interfaces with a device to enact a sequence of automated changes; (Support can be found on page 1, lines 13-16.)

said automation tool adapter including a queue listener; (Support can be found in Figure 2, # 300 and # 302.)

monitoring, by said queue listener, a plurality of clients by monitoring a request queue that is external to said automation tool adapter for messages; (Support can be found in Figure 2, # 310.)

determining, by said queue listener, whether said request queue includes an automation message; (Support can be found on page 13, lines 19-25.)

said automation message including a request having parameters in an original format that are to be executed using one of said automation tools, said automation message including a message identifier that uniquely identifies said automation message and a source of said automation message; (Support can be found on page 6, lines 14-16; page 7, lines 27-32; and page 12, line 29, through page 13, line 2.)

responsive to said queue listener determining that said request queue includes said automation message, said queue listener creating a verb dispatcher within said automation tool adapter; passing, by

said queue listener, said automation message to said verb dispatcher; (Support can be found on page 11, lines 16-22; and page 14, line 30, through page 15, line 4.)

creating, by said verb dispatcher, an automation processor of a type that is required by said automation message; translating, by said verb dispatcher, said parameters from said original format to a second format that is required by said one of said automation tools to produce translated parameters; providing, by said verb dispatcher, said message including said message identifier and said translated parameters to said automation processor; (Support can be found on page 17, line 17, through page 18, line 16.)

constructing, by said automation processor, an automation tool command using said translated parameters; (Support can be found on page 19, lines 4-5.)

executing, by said one of said automation tools, said automation tool command, said automation tool command including said translated parameters; in response to a completion of execution of said automation tool command, said one of said automation tools sending a reply to a reply server that is included in said automation tool adapter, said reply being in said second format and including said message identifier; (Support can be found on page 11, lines 14-15; page 12, line 29, through page 13, line 33; and Figure 2, # 308.)

translating, by said reply server, said reply into said original format to form a translated reply; sending, by said reply server, said translated reply to a reply queue that is external to said automation tool adapter. (Support can be found on page 20, lines 13-26).

Applicants' independent claims recite similar features; therefore, while claim 1 is discussed below in detail, the discussion also applies to claims 10 and 19.

Regarding Applicants' original claim 1, the Examiner asserted that *Kakivaya* teaches monitoring a plurality of clients for automation requests by teaching discovery clients monitoring Announce and ByeBye messages. Applicants' amended independent claims describe an automation message including a request having parameters in an original format that are to be executed using one of the automation tools. Monitoring Announce and ByeBye messages does not teach the features of Applicants' amended independent claims because Announce and ByeBye messages are not "automation messages". Announce and ByeBye messages do not include a request having parameters that are to be executed using an automation tool.

Applicants also claim an automation tool adapter that includes a queue listener, a verb dispatcher, an automation processor, and a reply server. The queue listener creates the verb dispatcher.

The queue listener monitors a request queue that is external to the automation tool adapter for automation messages. The queue listener passes automation messages to the verb dispatcher that it created.

The verb dispatcher translates the parameters of the automation message from the original format to a second format to produce translated parameters. The verb dispatcher also creates an automation processor of a type that is required by the automation message.

The automation processor constructs an automation tool command using the translated parameters.

The automation tool then executes the automation tool command. The automation tool command includes the translated parameters. In response to a completion of the execution of the automation tool command, the automation tool sends a reply to the reply server. The reply server is also included in the automation tool adapter.

The reply server then translates the reply into the original format to form a translated reply. The reply server then sends the translated reply to a reply queue that is external to the automation tool adapter.

*Kakivaya* does not teach a discovery client that includes these features. *Kakivaya* describes a cached description of a responder. *Kakivaya* also describes a configuration number that is associated with a configuration of a responder. When a configuration changes, the configuration number changes. The discovery client can use the configuration number to determine whether its cached description is up to date. If the cached copy is up to date, the discovery client does not need to contact the responder. See *Kakivaya*, paragraphs 0009 and 0084.

*Kakivaya* does not teach the discovery client having an automation tool adapter that includes a queue listener, a verb dispatcher, an automation processor, and a reply server. *Kakivaya* does not teach a queue listener, a verb dispatcher, an automation processor, and a reply server that perform the steps as claimed by Applicants.

Because *Kakivaya* does not teach an automation tool adapter that includes a queue listener, a verb dispatcher, an automation processor, and a reply server that perform the steps as claimed by Applicants, *Kakivaya* does not anticipate Applicants' claims 1, 10, and 19.

The remaining claims depend from one of the independent claims discussed above and are patentable for the reasons given above.

## **II. 35 U.S.C. § 103, Obviousness**

The Examiner has rejected claims 7, 16 and 25 under 35 U.S.C. § 103(a) as being unpatentable over *Kakivaya* in view of *Wong et al.*, System and Method to Facilitate Selection and Programming of an Associated Audio/Visual System, U.S. Patent No. 6,968,364, dated November 22, 2005 (hereinafter referred to as "*Wong*"). This rejection, as it might be applied to the claims as amended, is respectfully traversed.

Claims 7, 16, and 25 recite similar features. Claim 7 recites: The method according to claim 1, further comprising the steps of: including a unique message identifier in each one of a plurality of automation messages included in said request queue; and tracking each one of said plurality of automation messages utilizing said unique identifier.

The Examiner states that *Kakivaya* fails to teach using the unique identifier to track each received automation request and relies on *Wong* to teach this feature. *Wong* teaches a token GUID that uniquely identifies a token.

The combination of *Kakivaya* and *Wong* does not render Applicants' claims obvious because *Wong* does not supply the features that are missing from *Kakivaya*. The combination does not teach or suggest an automation tool adapter that includes a queue listener, a verb dispatcher, an automation processor, and a reply server that perform the steps as claimed by Applicants in combination with including a unique message identifier in each one of a plurality of automation messages included in said request queue; and tracking each one of said plurality of automation messages utilizing said unique identifier.

Therefore, the rejection of claims 7, 16 and 25 under 35 U.S.C. § 103(a) has been overcome.

### III. Conclusion

It is respectfully urged that the subject application is patentable over *Kakivaya* and *Wong* and is now in condition for allowance.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: July 23, 2007

Respectfully submitted,

/Lisa L.B. Yociss/

Lisa L.B. Yociss  
Reg. No. 36,975  
Yee & Associates, P.C.  
P.O. Box 802333  
Dallas, TX 75380  
(972) 385-8777  
Attorney for Applicants